

IN THE CIRCUIT COURT FOR SMYTH COUNTY, VIRGINIA

CHRISTOPHER HILL,

Plaintiff,

v.

Case No. 21-116

KHAMIDILLO ABDUMUXTOROV,
a/k/a KHAMIDILLO ABDUMUXTUROV,
SERVE: 1509 Quail Lane
Kill Devil Hills, NC

ASIRDIN BOZOROV
SERVE: 10225 Camden Lane
Unit D
Bridgeview, IL 60455

GLOBAL TRANSPORT LLC,
a Virginia limited liability company,
SERVE: Yosviel Gonzalez Herrera
164 Logan Lane
Harrisonburg, VA 22801

JURY TRIAL DEMANDED

and

GLOBAL TRANSPORTATION LLC,
a Colorado limited liability company,
SERVE: Rasul Khadzhiev,
Registered Agent
4500 S. Monaco St.
Unit #1725
Denver, CO 80237

Defendants.

COMPLAINT

Comes now the Plaintiff, Christopher Hill, by and through counsel, and moves for judgment against the Defendants, Khamidillo Abdumuxtorov, Asirdin Bozorov, Global Transportation LLC, and Global Transport LLC on the grounds and in the amount set forth below.

1. Christopher Hill ("Plaintiff") is a citizen and resident of Mercer County, West Virginia.

2. Upon information and belief, the Defendant, Khamidillo Abdumuxtorov, ("Defendant"), is a citizen and resident of Dare County, North Carolina.

3. Global Transportation LLC is a Colorado limited liability company with its principal place of business in Denver, Colorado.

4. Global Transport LLC is a Virginia limited liability company with its principal place of business in Harrisonburg, Virginia.

5. On or about the 12th day of May, 2019, Christopher Hill, ("Plaintiff"), was operating a tractor-trailer traveling north on Interstate 81 in Smyth County, Virginia.

6. At that same time and place, Khamidillo Abdumuxtorov ("Defendant Driver") was also operating a tractor-trailer that was entering the lane of travel from the right entrance ramp/lane north on Interstate 81.

7. At that same time and place, Defendant Driver improperly, negligently and recklessly drove his vehicle from the right entrance ramp/lane into Plaintiff's lane of travel thereby causing the two vehicles to collide, which caused grave bodily injury to Plaintiff.

8. At that time and place, it was the duty of the Defendant Driver to operate his vehicle with reasonable care and with due regard for others using the roadway.

9. Notwithstanding said duty, Defendant Driver carelessly, recklessly, and negligently operated his vehicle so that it collided with great force and violence into Plaintiff's vehicle.

10. Defendant Driver was negligent in that he:

a. Failed to keep a proper lookout;

- b. Failed to give full time and attention to the operation of his vehicle;
- c. Failed to keep his automobile under proper control;
- d. Operated his automobile in a reckless manner; and
- e. Failed to yield the right of way to Plaintiff's vehicle.

11. Defendant Driver's actions violated Virginia Code §46.2-804, and thus, he committed *per se* negligence.

12. The vehicle that Defendant Driver was operating was owned at the time of the crash by defendant Bozorov.

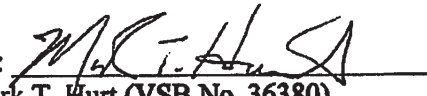
13. Before and at the time of the aforementioned crash, Defendant Driver was an employee and/or agent and/or apparent agent of defendants Global Transportation, LLC., Global Transport LLC, and/or Asirdin Bozorov, and was driving and otherwise acting in the course of his employment and/or agency with Global Transportation LLC, Global Transport LLC and/or Asirdin Bozorov. Thus, defendants Global Transportation LLC, Global Transport LLC, and/or Bozorov are liable for all of the aforementioned wrongful actions of Defendant Driver.

14. As a direct and proximate result of the Defendant Driver's careless, reckless and negligent actions noted above, Plaintiff suffered serious and permanent injuries including, but not limited to, debilitating pain and restricted use of the injured areas of his body, has incurred and will incur in the future hospital, doctors, and related bills in an effort to be cured of said injuries, and has suffered other losses.

WHEREFORE, the Plaintiff demands judgment against Defendants, severally and jointly, in the sum of Five Million (\$5,000,000.00) Dollars, together with pre-judgment interest, legal costs expended, and for such other and further relief as to which he may be entitled.

Respectfully submitted,

CHRISTOPHER HILL

By: 
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